

# OSBORN LAW P.C.

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August 19, 2021

**VIA ECF**

Honorable Debra Freeman  
United States Magistrate Judge  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *Rosado v. Commissioner of Social Security,*  
Civil Action No. 1:21-cv-01280-GBD-DCF

Dear Judge Freeman,

We write on behalf of plaintiff, Charlie Rosado, and with the consent of the defendant, to request a 60-day extension of time to file plaintiff's motion for judgment on the pleadings. Plaintiff's motion is due on August 23, 2021. Plaintiff respectfully requests an extension of time up to and including October 21, 2021. This is plaintiff's first request for an extension.

The additional time is necessary because our office has numerous closely scheduled (and overlapping) deadlines in social security matters. For several months we received countless requests from the Agency for additional time to serve administrative records because of delays the Agency was encountering in getting records prepared. We believe that the Agency has mostly emerged from this backlog, but it has had the unintended effect of creating a backlog on our end. For example, our office has over twenty briefs due between August 23, 2021, and September 3, 2021.

Subject to the approval of the Court, the parties propose the following revised briefing schedule of the Court's February 16, 2021 Scheduling Order:

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- a. Plaintiff to serve his motion for judgment on the pleadings on or before **October 21, 2021**;
- b. Defendant to serve its response/cross-motion on or before **December 21, 2021**; and
- c. Plaintiff to serve his reply (if any) on or before **January 11, 2021**.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn  
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The proposed schedule is adopted.

SO ORDERED

  
Debra Freeman  
United States Magistrate Judge

Dated: 9/27/2021  
(*nunc pro tunc* to 8/23/2021)

cc: Joseph Pantoja, Esq. (by ECF)